

EXHIBIT 1

UNITED STATES DISTRICT COURT
for the
DISTRICT OF MASSACHUSETTS

JUNIOR WILLIAMS,
Plaintiff

CIVIL ACTION NO. 3:16-CV-30142

vs.

KAWASAKI MOTORS CORP., U.S.A.;
KAWASAKI HEAVY INDUSTRIES, LTD.;
AND SPRINGFIELD MOTOR SPORTS, LLC
Defendants.

**PLAINTIFF JUNIOR WILLIAMS' NOTICE OF DEPOSITION OF PERSON MOST
QUALIFIED AT KAWASAKI MOTORS CORP. U.S.A. AND KAWASAKI HEAVY
INDUSTRIES, LTD'S REGARDING ANY CHANGES IN DESIGN OF FUEL TANK &
FUEL TANK PARTS ON THE 2006 KAWASAKI NINJA ZX-6RR(ZX600N6F) & 2007
KAWASAKI NINJA ZX-6R (ZX600P7F) & REQUEST FOR PRODUCTION OF
DOCUMENTS**

TO DEFENDANTS AND THEIR ATTORNEY OF RECORD:

PLEASE TAKE NOTICE that Plaintiff, JUNIOR WILLIAMS, through his attorneys of record, will take the following deposition:

DEPONENT: Person(s) Most Qualified at KAWASAKI MOTORS CORP., U.S.A. and KAWASAKI HEAVY INDUSTRIES, LTD'S regarding YOUR knowledge of any changes in the design of fuel tank and fuel tank parts on the 2006 KAWASAKI NINJA ZX-6RR(ZX600N6F) & 2007 KAWASAKI NINJA ZX-6R (ZX600P7F) specifically part numbers:

1. Bracket/tank part 32052 and any attaching bolts, collars or sockets;
2. Fuel tank part 51085 and any attaching bolts, collars or sockets.

(Please see attachment "A" below for designated topics).

DATE: February 4, 2018
TIME: 9:00 a.m.

LOCATION: Catuogno Court Reporting,
One Monarch Place, 6th Floor
1414 Main St., Springfield, MA

[Or, time, date & location
agreed upon by the parties or
designated by the Court.]

The deposition will be conducted before a qualified officer as required by Fed.R.Civ.P.30. Said deposition(s) will be recorded stenographically and videotaped for use at trial. The deposition will be taken before a certified shorthand reporter authorized to administer oaths in the State of Massachusetts, who will be present at the specified time and place for deposition.

Said deposition shall continue from day to day until its completion, excluding Sundays and Holidays.

IF A FOREIGN LANGUAGE INTERPRETER IS NECESSARY for the deponent(s), counsel for defendant employee is requested to advise plaintiff's counsel, in writing, at least five (5) days prior to the dated of the deposition of the need for an interpreter and the language and/or dialect required by the deponent.

PLEASE TAKE FURTHER NOTICE pursuant to Fed.R.Civ.P.30(b)(6), Defendant, KAWASAKI MOTORS CORP., U.S.A. and KAWASAKI HEAVY INDUSTRIES, LTD shall designate and produce at the deposition one or more of its officers, directors, managing agents, employees and/or agents who are most qualified to testify on its behalf as to the following issues:

1. Person(s) Most Qualified at KAWASAKI MOTORS CORP., U.S.A. and KAWASAKI HEAVY INDUSTRIES, LTD, regarding YOUR knowledge of any changes in the design of the fuel tank and fuel tank parts on the 2006 KAWASAKI NINJA ZX-6RR(ZX600N6F) & 2007 KAWASAKI NINJA ZX-6R (ZX600P7F). (Please see attachment "A" below for designated topics).

NOTICE IS FURTHER GIVEN that in addition to attending at the time and place specified above, the deponent is required, pursuant to Fed.R.Civ.P. 34(c), to produce at their respective depositions, for inspection, copying, photographing, and/or photocopying, any and all WRITINGS and DOCUMENTS related to the Matters for Examination set forth above.

DEFINITIONS:

1. The terms “YOU” and “YOUR” refer to Defendant KAWASAKI MOTORS CORP., U.S.A. and KAWASAKI HEAVY INDUSTRIES, LTD, including but not limited to, its employees, staff members, agents, representatives, investigators, attorneys, consultants, or anyone acting on its behalf.

2. The term “PERSON” refers to a natural person, corporation, partnership, joint venture or other business association or entity.

3. The term “SUBJECT MOTORCYCLE” when used herein refers to the motorcycle, described in the Second Amended Complaint as the 2007 Kawasaki, model ZX600P, the one involved in the SUBJECT INCIDENT, including its components parts.

4. The term “WRITING” means handwriting, typewriting printing, photostating, photographing, photocopying, transmitting by electronic mail or facsimile, and every other means of recording upon any tangible thing, any form of communication or representation, including letters, words, pictures, sounds, or symbols, or combinations thereof, and any record thereby created, regardless of the manner in which the record has been stored.”

5. The term “DOCUMENT(S)” means a writing, and includes the original or copy of: handwriting, typewriting, correspondence records tables, charts, graphs, schedules, reports, memoranda, notes, letters, telegrams, messages, reports of telephone conversations, reports of conferences, books, journals, ledgers, checks, receipts, invoices, instructions, minutes, purchase, orders, films, film, strips, motions picture film, magnetic or other recorded tapes, transcriptions,

and other written, printed or recorded material of any kind.

6. The term “ADDRESS” means the street address, which includes the city, state, country and zip code, including but not limited to place of business, work, and home.

7. The term “IDENTIFY” means current or last known address, telephone numbers and name(s), and includes but is not limited to DOCUMENTS.

8. The term “COMPLAINT” refers to Plaintiff’s Complaint for Damages, including Plaintiff’s Second Amended Complaint filed in the United States District Court Central District of Massachusetts, commonly known as 3:16-cv-30142.

9. The term “SUBJECT INCIDENT” refers to the events and surrounding circumstances on or about July 30, 2013, that resulted in Plaintiff’s injuries as set forth in the SECOND AMENDED COMPLAINT.

10. The term “PLAINTIFF” means JUNIOR WILLIAMS.

11. The term “DEFENDANT” means KAWASAKI MOTORS CORP., U.S.A. and KAWASAKI HEAVY INDUSTRIES, LTD.

12. The term “DESCRIBE” when used herein with respect to an act or event shall require YOU to set forth in full and complete detail all facts and circumstances surrounding the act or event including, but not limited to, the dates on which said acts or events took place, the identity of all PERSONS involved, the description of all documents relating or referring to said acts or events, and the nature of the acts or events.

13. The term “DESCRIBE” when used herein with respect to an object or condition shall require YOU to set forth in full detail all facts and circumstances surrounding the object or condition including, but not limited to, the nature and location of the object or condition, its physical and chemical properties and characteristics, as appropriate, and the identification of all documents which relate to said object or condition.

14. The term “DESCRIBE” when used herein with respect to a document shall require YOU to designate such document with sufficient particularity such that it meets the requirements of the Federal Rules of Evidence.

15. The term “DESIGN DOCUMENTS” includes documents outlining material specifications, mechanical specifications, CAD drawings, blueprints, shop drawings, patents,

REQUEST FOR PRODUCTION OF DOCUMENTS

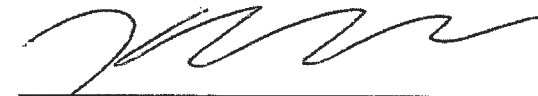
1. DESIGN DOCUMENTS concerning bracket/tank part 32052 and any attaching bolts, collars or sockets for the 2006 KAWASAKI NINJA ZX-6RR(ZX600N6F) .
2. DESIGN DOCUMENTS concerning bracket/tank part 32052 and any attaching bolts, collars or sockets for the 2007 KAWASAKI NINJA ZX-6R(ZX600P7F).
3. DOCUMENTS concerning the change in design of bracket/tank part 32052 and any attaching bolts, collars or sockets for the years 2006-2007.
4. DOCUMENTS concerning testing of bracket/tank part 32052 and any attaching bolts, collars or sockets for the years 2006-2007.
5. DESIGN DOCUMENTS concerning fuel tank part 51085 and any attaching bolts, collars or sockets for the 2006 KAWASAKI NINJA ZX-6RR(ZX600N6F) .
6. DESIGN DOCUMENTS concerning fuel tank part 51085 and any attaching bolts, collars or sockets for the 2007 KAWASAKI NINJA ZX-6R(ZX600P7F).
7. DOCUMENTS concerning the change in design of fuel tank part 51085 for the years 2006-2007.

///

8. DOCUMENTS concerning testing of fuel tank part 51085 and any attaching bolts, collars or sockets for the years 2006.
9. DOCUMENTS concerning testing of fuel tank part 51085 and any attaching bolts, collars or sockets for the years 2007.
10. The factory service & parts manual for 2006 KAWASAKI NINJA ZX-6RR(ZX600N6F).
11. The owners manual for 2006 KAWASAKI NINJA ZX-6RR(ZX600N6F).

DATED: December 12, 2018

DODGE LAW FIRM, INC.



Terrence L. Butler, Esq.
Karla M. Castro, Esq.
Attorney for Plaintiff
JUNIOR WILLIAMS

ATTACHMENT A

1. DESIGN of bracket/tank part 32052 and any attaching bolts, collars or sockets for the 2006 KAWASAKI NINJA ZX-6RR (ZX600N6F).
2. DESIGN of bracket/tank part 32052 and any attaching bolts, collars or sockets for the 2007 KAWASAKI NINJA ZX-6R (ZX600P7F).
3. Change in design of bracket/tank part 32052 and any attaching bolts, collars or sockets for the years 2006-2007.
4. Testing of bracket/tank part 32052 and any attaching bolts, collars or sockets for the years 2006-2007.
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7. Change in design of fuel tank part 51085 and any attaching bolts, collars or sockets for the years 2006-2007.
8. Testing of fuel tank part 51085 and any attaching bolts, collars or sockets for the years 2006.
9. Testing of fuel tank part 51085 and any attaching bolts, collars or sockets for the years 2006.
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11. The owners manual for 2006 KAWASAKI NINJA ZX-6RR(ZX600N6F).

CERTIFICATE OF SERVICE

I, Karla Castro, attorney for plaintiff/decedent Junior Williams, hereby certify that on December 12, 2018, a true copy of the foregoing Notice of Deposition of Person Most Qualified at Kawasaki Motors Corp. U.S.A. and Kawasaki Heavy Industries, Ltd's Regarding Any Changes in Design of Fuel Tank & Fuel Tank Parts on the 2006 Kawasaki Ninja ZX-6RR (ZX600N6F) & 2007 Kawasaki Ninja ZX-6R (ZX600P7F) and Request for Production of Documents, will be served by first-class mail, postage prepaid and e-mail upon to:

John Greenwood, Esq.
1145 Mains Street, Suite 201
Springfield MA 01103

Peter Durney, Esq.
Christopher Hurst, Esq.
CORNELL & GOLLUB
75 Federal Street
Boston, MA 02110

Jeanne O. McHugh, Esq.
Matthew Kirouac, Esq.
Engelberg & Bratcher
100 High Street, Suite 1450
Boston, MA 02110

/s/ Karla Castro

UNITED STATES DISTRICT COURT
for the
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JUNIOR WILLIAMS,
Plaintiff

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1. Bracket/tank part 32052 and any attaching bolts, collars or sockets;
2. Fuel tank part 51085 and any attaching bolts, collars or sockets.

(Please see attachment "A" below for designated topics).

DATE:	February 4, 2018	
TIME:	11:00 a.m.	
LOCATION:	Catuogno Court Reporting, One Monarch Place, 6 th Floor 1414 Main St., Springfield, MA	[Or, time, date & location agreed upon by the parties or designated by the Court.]

The deposition will be conducted before a qualified officer as required by Fed.R.Civ.P.30. Said deposition(s) will be recorded stenographically and videotaped for use at trial. The deposition will be taken before a certified shorthand reporter authorized to administer oaths in the State of Massachusetts, who will be present at the specified time and place for deposition.

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(Please see attachment "A" below for designated topics).

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15. The term “DESIGN DOCUMENTS” includes documents outlining material specifications, mechanical specifications, CAD drawings, blueprints, shop drawings, patents.

REQUEST FOR PRODUCTION OF DOCUMENTS

1. DESIGN DOCUMENTS concerning bracket/tank part 32052 and any attaching bolts, collars or sockets for the 2007 KAWASAKI NINJA ZX-6R(ZX600P7F).
2. DESIGN DOCUMENTS concerning bracket/tank part 32052 and any attaching bolts, collars or sockets for the 2008 KAWASAKI NINJA ZX-6R (ZX600P8F) & (ZX600P8FA).
3. DOCUMENTS concerning the change in design of bracket/tank part 32052 and any attaching bolts, collars or sockets for the years 2007-2008.
4. DOCUMENTS concerning testing of bracket/tank part 32052 and any attaching bolts, collars or sockets for the years 2007-2008.
5. DESIGN DOCUMENTS concerning fuel tank part 51085 and any attaching bolts, collars or sockets for the 2007 KAWASAKI NINJA ZX-6R(ZX600P7F).
6. DESIGN DOCUMENTS concerning fuel tank part 51085 and any attaching bolts, collars or sockets for the 2008 KAWASAKI NINJA ZX-6R (ZX600P8F) & (ZX600P8FA).

///

7. DOCUMENTS concerning the change in design of fuel tank part 51085 and any attaching bolts, collars or sockets for the years 2007-2008.
8. DOCUMENTS concerning testing of fuel tank part 51085 and any attaching bolts, collars or sockets for the year 2007.
9. DOCUMENTS concerning testing of fuel tank part 51085 and any attaching bolts, collars or sockets for the year 2008.
10. The factory service & parts manual for 2007 KAWASAKI NINJA ZX-6R(ZX600P7F).
11. The owners manual for 2007 KAWASAKI NINJA ZX-6R(ZX600P7F).

DATED: December 12, 2018

DODGE LAW FIRM, INC.



Terrence L. Butler, Esq.
Karla M. Castro, Esq.
Attorney for Plaintiff
JUNIOR WILLIAMS

ATTACHMENT A

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CERTIFICATE OF SERVICE

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John Greenwood, Esq.
1145 Mains Street, Suite 201
Springfield MA 01103

Peter Durney, Esq.
James Kerr, Esq.
Christopher Hurst, Esq.
CORNELL & GOLLUB
75 Federal Street
Boston, MA 02110

Jeanne O. McHugh, Esq.
Matthew Kirouac, Esq.
Engelberg & Bratcher
100 High Street, Suite 1450
Boston, MA 02110

/s/ Karla Castro

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KAWASAKI NINJA ZX-6R (ZX600R9F) & REQUEST FOR PRODUCTION OF
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DATE:	February 4, 2018	
TIME:	1:00 p.m.	
LOCATION:	Catuogno Court Reporting, One Monarch Place, 6 th Floor 1414 Main St., Springfield, MA	[Or, time, date & location agreed upon by the parties or designated by the Court.]

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REQUEST FOR PRODUCTION OF DOCUMENTS


1. DESIGN DOCUMENTS concerning bracket/tank part 32052 and any attaching bolts, collars or sockets for the of the 2008 KAWASAKI NINJA ZX-6R (ZX600P8F) & (ZX600P8FA).
2. DESIGN DOCUMENTS concerning bracket/tank part 32052 and any attaching bolts, collars or sockets for the 2009 KAWASAKI NINJA ZX-6R (ZX600R9F).
3. DOCUMENTS concerning the change in design of bracket/tank part 32052 and any attaching bolts, collars or sockets for the years 2008-2009.
4. DOCUMENTS concerning testing of bracket/tank part 32052 and any attaching bolts, collars or sockets for the years 2008-2009.
5. DESIGN DOCUMENTS concerning fuel tank part 51085 and any attaching bolts, collars or sockets for the 2008 KAWASAKI NINJA ZX-6R (ZX600P8F) & (ZX600P8FA).
6. DESIGN DOCUMENTS concerning fuel tank part 51085 and any attaching bolts, collars or sockets for the 2009 KAWASAKI NINJA ZX-6R

(ZX600R9F).

7. DOCUMENTS concerning the change in design of fuel tank part 51085 and any attaching bolts, collars or sockets for the years 2008-2009.
8. DOCUMENTS concerning testing of fuel tank part 51085 and any attaching bolts, collars or sockets for the year 2008.
9. DOCUMENTS concerning testing of fuel tank part 51085 and any attaching bolts, collars or sockets for the year 2009.
10. The factory service & parts manual for 2008 KAWASAKI NINJA ZX-6R (ZX600P8F) & (ZX600P8FA).
11. The owners manual for 2008 KAWASAKI NINJA ZX-6R (ZX600P8F) & (ZX600P8FA).

DATED: December 12, 2018

DODGE LAW FIRM, INC.



Terrence L. Butler, Esq.
Karia M. Castro, Esq.
Attorney for Plaintiff
JUNIOR WILLIAMS

ATTACHMENT A

1. DESIGN of bracket/tank part 32052 and any attaching bolts, collars or sockets for the 2008 KAWASAKI NINJA ZX-6R (ZX600P8F) & (ZX600P8FA).
2. DESIGN of bracket/tank part 32052 and any attaching bolts, collars or sockets for the 2009 KAWASAKI NINJA ZX-6R (ZX600R9F).
3. Change in design of bracket/tank part 32052 and any attaching bolts, collars or sockets for the years 2008-2009.
4. Testing of bracket/tank part 32052 and any attaching bolts, collars or sockets for the years 2008-2009.
5. DESIGN of fuel tank part 51085 for the 2008 KAWASAKI NINJA ZX-6R (ZX600P8F) & (ZX600P8FA).
6. DESIGN of fuel tank part 51085 for the 2009 KAWASAKI NINJA ZX-6R (ZX600R9F).
7. Change in design of fuel tank part 51085 for the years 2008-2009.
8. Testing of fuel tank part 51085 and any attaching bolts, collars or sockets for the year 2008.
9. Testing of fuel tank part 51085 and any attaching bolts, collars or sockets for the year 2009.
10. The factory service & parts manual for 2008 KAWASAKI NINJA ZX-6R (ZX600P8F) & (ZX600P8FA).
11. The owners manual for 2008 KAWASAKI NINJA ZX-6R (ZX600P8F) & (ZX600P8FA).

CERTIFICATE OF SERVICE

I, Karla Castro, attorney for plaintiff/decedent Junior Williams, hereby certify that on December 12, 2018, a true copy of the foregoing Notice of Deposition of Person Most Qualified at Kawasaki Motors Corp. U.S.A. and Kawasaki Heavy Industries, Ltd's regarding your knowledge of any changes in design of fuel tank & fuel tank parts on the 2008 KAWASAKI NINJA ZX-6R (ZX600P8F)/(ZX600P8FA) & 2009 KAWASAKI NINJA ZX-6R (ZX600R9F) & Request for Production of Documents, will be served by first-class mail, postage prepaid and e-mail upon to:

John Greenwood, Esq.
1145 Mains Street, Suite 201
Springfield MA 01103

Peter Durney, Esq.
James Kerr, Esq.
Christopher Hurst, Esq.
CORNELL & GOLLUB
75 Federal Street
Boston, MA 02110

Jeanne O. McHugh, Esq.
Matthew Kirouac, Esq.
Engelberg & Bratcher
100 High Street, Suite 1450
Boston, MA 02110

/s/ Karla Castro

UNITED STATES DISTRICT COURT
for the
DISTRICT OF MASSACHUSETTS

JUNIOR WILLIAMS,
Plaintiff

CIVIL ACTION NO. 3:16-CV-30142

vs.

KAWASAKI MOTORS CORP., U.S.A.;
KAWASAKI HEAVY INDUSTRIES, LTD.;
AND SPRINGFIELD MOTOR SPORTS, LLC
Defendants.

**PLAINTIFF JUNIOR WILLIAMS' NOTICE OF DEPOSITION OF PERSON MOST
QUALIFIED AT KAWASAKI MOTORS CORP. U.S.A. AND KAWASAKI HEAVY
INDUSTRIES, LTD'S REGARDING ANY CHANGES IN DESIGN OF FUEL TANK &
FUEL TANK PARTS ON THE 2009 KAWASAKI NINJA ZX-6R (ZX600R9F) & 2010
KAWASAKI NINJA ZX-6R (ZX600RAF) & REQUEST FOR PRODUCTION OF
DOCUMENTS**

TO DEFENDANTS AND THEIR ATTORNEY OF RECORD:

PLEASE TAKE NOTICE that Plaintiff, JUNIOR WILLIAMS, through his attorneys of record, will take the following deposition:

DEPONENT: Person(s) Most Qualified at KAWASAKI MOTORS CORP., U.S.A. and KAWASAKI HEAVY INDUSTRIES, LTD'S regarding YOUR knowledge of any changes in design of fuel tank & fuel tank parts on the 2009 KAWASAKI NINJA ZX-6R (ZX600R9F) & 2010 KAWASAKI NINJA ZX-6R (ZX600RAF) specifically part numbers:

1. Bracket/tank part 32052 and any attaching bolts, collars or sockets;
2. Fuel tank part 51085 and any attaching bolts, collars or sockets.

(Please see attachment "A" below for designated topics).

DATE: February 4, 2018
TIME: 3:00 p.m.

LOCATION: Catuogno Court Reporting,
One Monarch Place, 6th Floor
1414 Main St., Springfield, MA

[Or, time, date & location
agreed upon by the parties or
designated by the Court.]

The deposition will be conducted before a qualified officer as required by Fed.R.Civ.P.30. Said deposition(s) will be recorded stenographically and videotaped for use at trial. The deposition will be taken before a certified shorthand reporter authorized to administer oaths in the State of Massachusetts, who will be present at the specified time and place for deposition.

Said deposition shall continue from day to day until its completion, excluding Sundays and Holidays.

IF A FOREIGN LANGUAGE INTERPRETER IS NECESSARY for the deponent(s), counsel for defendant employee is requested to advise plaintiff's counsel, in writing, at least five (5) days prior to the dated of the deposition of the need for an interpreter and the language and/or dialect required by the deponent.

PLEASE TAKE FURTHER NOTICE pursuant to Fed.R.Civ.P.30(b)(6), Defendant, KAWASAKI MOTORS CORP., U.S.A. and KAWASAKI HEAVY INDUSTRIES, LTD shall designate and produce at the deposition one or more of its officers, directors, managing agents, employees and/or agents who are most qualified to testify on its behalf as to the following issues:

1. Person(s) Most Qualified at KAWASAKI MOTORS CORP., U.S.A. and KAWASAKI HEAVY INDUSTRIES, LTD, regarding YOUR knowledge of any changes in design of fuel tank & fuel tank parts on the 2009 KAWASAKI NINJA ZX-6R (ZX600R9F) & 2010 KAWASAKI NINJA ZX-6R (ZX600RAF). (Please see attachment "A" below for designated topics).

NOTICE IS FURTHER GIVEN that in addition to attending at the time and place specified above, the deponent is required, pursuant to Fed.R.Civ.P. 34(c), to produce at their respective depositions, for inspection, copying, photographing, and/or photocopying, any and all WRITINGS and DOCUMENTS related to the Matters for Examination set forth above.

DEFINITIONS:

1. The terms “YOU” and “YOUR” refer to Defendant KAWASAKI MOTORS CORP., U.S.A. and KAWASAKI HEAVY INDUSTRIES, LTD, including but not limited to, its employees, staff members, agents, representatives, investigators, attorneys, consultants, or anyone acting on its behalf.
2. The term “PERSON” refers to a natural person, corporation, partnership, joint venture or other business association or entity.
3. The term “SUBJECT MOTORCYCLE” when used herein refers to the motorcycle, described in the Second Amended Complaint as the 2007 Kawasaki, model ZX600P, the one involved in the SUBJECT INCIDENT, including its components parts.
4. The term “WRITING” means handwriting, typewriting printing, photostating, photographing, photocopying, transmitting by electronic mail or facsimile, and every other means of recording upon any tangible thing, any form of communication or representation, including letters, words, pictures, sounds, or symbols, or combinations thereof, and any record thereby created, regardless of the manner in which the record has been stored.”
5. The term “DOCUMENT(S)” means a writing, and includes the original or copy of: handwriting, typewriting, correspondence records tables, charts, graphs, schedules, reports, memoranda, noted, letters, telegrams, messages, reports of telephone conversations, reports of conferences, books, journals, ledgers, checks, receipts, invoices, instructions, minutes, purchase, orders, films, film, strips, motions picture film, magnetic or other recorded tapes, transcriptions,

and other written, printed or recorded material of any kind.

6. The term "ADDRESS" means the street address, which includes the city, state, country and zip code, including but not limited to place of business, work, and home.

7. The term "IDENTIFY" means current or last known address, telephone numbers and name(s), and includes but is not limited to DOCUMENTS.

8. The term "COMPLAINT" refers to Plaintiff's Complaint for Damages, including Plaintiff's Second Amended Complaint filed in the United States District Court Central District of Massachusetts, commonly known as 3:16-cv-30142.

9. The term "SUBJECT INCIDENT" refers to the events and surrounding circumstances on or about July 30, 2013, that resulted in Plaintiff's injuries as set forth in the SECOND AMENDED COMPLAINT.

10. The term "PLAINTIFF" means JUNIOR WILLIAMS.

11. The term "DEFENDANT" means KAWASAKI MOTORS CORP., U.S.A. and KAWASAKI HEAVY INDUSTRIES, LTD.

12. The term "DESCRIBE" when used herein with respect to an act or event shall require YOU to set forth in full and complete detail all facts and circumstances surrounding the act or event including, but not limited to, the dates on which said acts or events took place, the identity of all PERSONS involved, the description of all documents relating or referring to said acts or events, and the nature of the acts or events.

13. The term "DESCRIBE" when used herein with respect to an object or condition shall require YOU to set forth in full detail all facts and circumstances surrounding the object or condition including, but not limited to, the nature and location of the object or condition, its physical and chemical properties and characteristics, as appropriate, and the identification of all documents which relate to said object or condition.

14. The term “DESCRIBE” when used herein with respect to a document shall require YOU to designate such document with sufficient particularity such that it meets the requirements of the Federal Rules of Evidence.

15. The term “DESIGN DOCUMENTS” includes documents outlining material specifications, mechanical specifications, CAD drawings, blueprints, shop drawings, patents,

REQUEST FOR PRODUCTION OF DOCUMENTS

1. DESIGN DOCUMENTS concerning bracket/tank part 32052 and any attaching bolts, collars or sockets for the of the 2009 KAWASAKI NINJA ZX-6R (ZX600R9F).
2. DESIGN DOCUMENTS concerning bracket/tank part 32052 and any attaching bolts, collars or sockets for the 2010 KAWASAKI NINJA ZX-6R (ZX600RAF).
3. DOCUMENTS concerning the change in design of bracket/tank part 32052 and any attaching bolts, collars or sockets for the years 2009-2010.
4. DOCUMENTS concerning testing of bracket/tank part 32052 and any attaching bolts, collars or sockets for the years 2009-2010.
5. DESIGN DOCUMENTS concerning fuel tank part 51085 and any attaching bolts, collars or sockets for the 2009 KAWASAKI NINJA ZX-6R (ZX600R9F).
6. DESIGN DOCUMENTS concerning fuel tank part 51085 and any attaching bolts, collars or sockets for the 2010 KAWASAKI NINJA ZX-6R (ZX600RAF).

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7. DOCUMENTS concerning the change in design of fuel tank part 51085 and any attaching bolts, collars or sockets for the years 2009-2010.
8. DOCUMENTS concerning testing of fuel tank part 51085 and any attaching bolts, collars or sockets for the year 2009.
9. DOCUMENTS concerning testing of fuel tank part 51085 and any attaching bolts, collars or sockets for the year 2010.
10. The factory service & parts manual for 2009 KAWASAKI NINJA ZX-6R (ZX600R9F).
11. The owners manual for 2009 KAWASAKI NINJA ZX-6R (ZX600R9F).
12. The factory service & parts manual for 2010 KAWASAKI NINJA ZX-6R (ZX600RAF).
13. The owners manual for 2010 KAWASAKI NINJA ZX-6R (ZX600RAF).

DATED: December 14, 2018

DODGE LAW FIRM, INC.



Terrence L. Butler, Esq.
Karia M. Castro, Esq.
Attorney for Plaintiff
JUNIOR WILLIAMS

ATTACHMENT A

1. DESIGN of bracket/tank part 32052 and any attaching bolts, collars or sockets for the 2009 KAWASAKI NINJA ZX-6R (ZX600R9F).
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11. The owners manual for 2009 KAWASAKI NINJA ZX-6R (ZX600R9F).
12. The factory service & parts manual for 2010 KAWASAKI NINJA ZX-6R (ZX600RAF).
13. The owners manual for 2010 KAWASAKI NINJA ZX-6R (ZX600RAF).

CERTIFICATE OF SERVICE

I, Karla Castro, attorney for plaintiff/decedent Junior Williams, hereby certify that on December 12, 2018, a true copy of the foregoing Notice of Deposition of Person Most Qualified at Kawasaki Motors Corp. U.S.A. and Kawasaki Heavy Industries, Ltd's regarding your knowledge of any changes in design of fuel tank & fuel tank parts on the 2009 KAWASAKI NINJA ZX-6R (ZX600R9F) & 2010 KAWASAKI NINJA ZX-6R (ZX600RAF) & Request for Production of Documents, will be served by first-class mail, postage prepaid and e-mail upon to:

John Greenwood, Esq.
1145 Mains Street, Suite 201
Springfield MA 01103

Peter Durney, Esq.
James Kerr, Esq.
Christopher Hurst, Esq.
CORNELL & GOLLUB
75 Federal Street
Boston, MA 02110

Jeanne O. McHugh, Esq.
Matthew Kirouac, Esq.
Engelberg & Bratcher
100 High Street, Suite 1450
Boston, MA 02110

/s/ Karla Castro